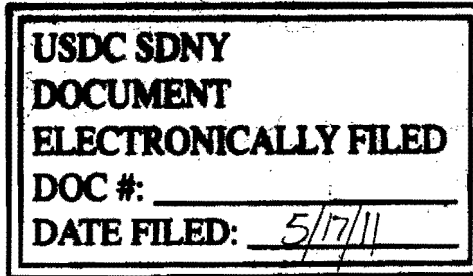


CHAMBERS OF
DEBRA FREEMAN
USM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



FREEMAN, MS.

-----X
ZAO KASPERSKY LAB,

Plaintiff,

v.

TALL LICENSING LIMITED,
DEFENDER PRO US, 5381 PARTNERS,
LLC and STEVE GROSSMAN,

Defendants.
-----X

Case No. 09-cv-3167 (DCF)

ECF CASE


STIPULATION AND ORDER OF DISMISSAL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel
for the respective parties, that:

1. All of the claims and counterclaims in the above-captioned action are
dismissed, without prejudice, pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure,
with no award of counsel fees or costs to any party, and

2. Upon plaintiff's receipt of full payment of the "Settlement Balance", as
defined in Section 2.2 of the certain Settlement Agreement among the parties to this action dated
April 21, 2011, the dismissal of all of the claims and counterclaims in the above-captioned action
shall become with prejudice.

ARENT FOX LLP

By: 
Marylee Jenkins
1675 Broadway
New York, NY 10019-5820
212.484.3900
Attorneys for Plaintiff

Dated: May 11, 2011

PRYOR CASHMAN LLP

By: 

John J. Lynch (JL-8196)

7 Times Square

New York, New York 10036-6569

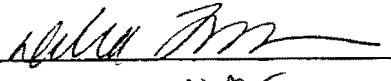
(212) 421-4100

Attorneys for Defendants

Dated: May 11, 2011.

SO ORDERED:

5/17/11


U.S. Magistrate Judge
msl